522418-70602

June 13, 2006

RE: Business Opportunity Rule R511993

Dear Sir/Madam.



I have been in the network marketing business for over 20 years and have had tremendous person growth and business success as well as I have developed long term relationships with hundreds of people who like me, need to supplement their income, particularly as a single person. I love the opportunity of showing people how they, too can have personal growth and can gain independence time wise as well as financially, depending on what their goals are. The possibility of helping others is a big plus in this industry and to be with a company of such high integrity is a joy and a privilege. I am sure that there are a few fraudulent groups out there, but you, the FTC's proposed rule would unfairly target legitimate direct selling businesses.

I am greatly concerned about the proposed Business Opportunity Rule R511993 that might be adopted in it's present form and if it is it will significantly undermine my livelihood as a SYNERGY WORLDWIDE distributor.

Governmental interference in the free enterprise process terrifies all the hearts of Americans! The FTC needs to be aware of the dangers of ill-considered action!

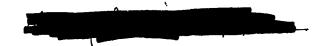
SYNERGY WORLDWIDE complies with all applicable buy-back requirements and always has the best interest of the distributor in every situation., including leaving the Company if it is not right for them. Over regulations of an industry such as ours, by the FTC is not well served as the Company has adequately policed itself in any situation /complaints that have come up. They are prompt and fair and go out of their way to remedy anything..

The proposed 7 day waiting period strikes a core that something may be wrong and will interfere with my ability to enter into lawful transactions and enroll new distributors. People buy TV's, cars, boats, and other much more costly items without such a waiting period. Again, it makes it seem like there could be something wrong with the plan. The burdensome paperwork, which would not be read by the public, makes it extremely difficult for the individual participant to fully comply, thereby risking fines and penalties for such failures, however innocent. By these actions the FTC does a disservice to the consuming public and Americans everywhere who are trying to get ahead by starting their own business, or adding necessary supplemental income to their family which most of us need.

I appreciate your work to protect the consumer, I believe that this proposal has many unintended consequences that could be avoided by a less burdensome approach. I urge you to reconsider this.

Thank you for considering my comments.

Sincerely yours,



Lucy Livingston Brown